



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Note to Reader
January 8, 1998

Background: As part of its effort to involve the public in the implementation of the Food Quality Protection Act of 1996 (FQPA), which is designed to ensure that the United States continues to have the safest and most abundant food supply. EPA is undertaking an effort to open public dockets on the organophosphate pesticides. These dockets will make available to all interested parties documents that were developed as part of the U.S. Environmental Protection Agency's process for making reregistration eligibility decisions and tolerance reassessments consistent with FQPA. The dockets include preliminary health assessments and, where available, ecological risk assessments conducted by EPA, rebuttals or corrections to the risk assessments submitted by chemical registrants, and the Agency's response to the registrants' submissions.

The analyses contained in this docket are preliminary in nature and represent the information available to EPA at the time they were prepared. Additional information may have been submitted to EPA which has not yet been incorporated into these analyses, and registrants or others may be developing relevant information. It's common and appropriate that new information and analyses will be used to revise and refine the evaluations contained in these dockets to make them more comprehensive and realistic. The Agency cautions against premature conclusions based on these preliminary assessments and against any use of information contained in these documents out of their full context. Throughout this process, If unacceptable risks are identified, EPA will act to reduce or eliminate the risks.

There is a 60 day comment period in which the public and all interested parties are invited to submit comments on the information in this docket. Comments should directly relate to this organophosphate and to the information and issues available in the information docket. Once the comment period closes, EPA will review all comments and revise the risk assessments, as necessary.

These preliminary risk assessments represent an early stage in the process by which EPA is evaluating the regulatory requirements applicable to existing pesticides. Through this opportunity for notice and comment, the Agency hopes to advance the openness and scientific soundness underpinning its decisions. This process is designed to assure that America continues to enjoy the safest and most abundant food supply. Through implementation of EPA's tolerance reassessment program under the Food Quality Protection Act, the food supply will become even safer. Leading health experts recommend that all people eat a wide variety of foods, including at least five servings of fruits and vegetables a day.

Note: This sheet is provided to help the reader understand how refined and developed the pesticide file is as of the date prepared, what if any changes have occurred recently, and what new information, if any, is expected to be included in the analysis before decisions are made. **It is not meant to be a summary of all current information regarding the chemical.** Rather, the sheet provides some context to better understand the substantive material in the docket (RED chapters, registrant rebuttals, Agency responses to rebuttals, etc.) for this pesticide.

Further, in some cases, differences may be noted between the RED chapters and the Agency's comprehensive reports on the hazard identification information and safety factors for all organophosphates. In these cases, information in the comprehensive reports is the most current and will, barring the submission of more data that the Agency finds useful, be used in the risk assessments.

A handwritten signature in black ink, appearing to read 'J. Housenger', is written over the typed name and title.

Jack E. Housenger, Acting Director
Special Review and Reregistration Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

July 21, 1998

MEMORANDUM

SUBJECT: Pirimiphos-methyl. (Chemical ID No. 108102/List B Reregistration Case No. 2535).
Acute and Chronic Dietary Risk Analyses. No MRID #. DP Barcode No. D245961.

FROM: Christina B. Swartz, Chemist
Reregistration Branch 1
Health Effects Division (7509C)

THRU: Whang Phang, Ph.D., Branch Senior Scientist
Reregistration Branch 1
Health Effects Division (7509C)

TO: Merle Sykes/Arnold Layne (PM-51)
Accelerated Reregistration Branch
Special Review and Reregistration Division (7508W)

Action Requested

In conjunction with completion of a residue chemistry chapter of the HED RED, an anticipated residue assessment has been conducted for the organophosphate active ingredient pirimiphos-methyl. Based on anticipated residues in commodities associated with the post-harvest use on grain, and on toxicological endpoints selected for acute and chronic dietary exposure, both acute and chronic dietary risk assessments should be conducted using the Dietary Exposure Evaluation Model (DEEMTM).

Toxicological Information

The HED Hazard Identification Assessment Review Committee (HIARC) met 1/12/98 to select a dose and endpoint for acute dietary risk assessment; in addition, the committee reassessed the reference dose (RfD) established for chronic dietary risk assessment. Finally, the committee addressed special sensitivity to infants and children as required by the Food Quality Protection Act (FQPA) of 1996. The conclusions of the Committee for pirimiphos-methyl were presented in a memo dated 1/29/98 (J. Rowland). In meetings conducted to assess consistency in selecting endpoints and safety factors for all organophosphates, changes were made to the conclusions of the HIARC. These are summarized in the relevant sections, below.

Acute Dietary

Two oral studies conducted in humans were selected for establishing an acute dietary endpoint and NOEL. The 56-day and 28-day oral toxicity studies were summarized in the Committee report. Cholinesterase inhibition was not observed in either study prior to day 14; however, only one dose was tested, 0.25 mg/kg/day, and it was presumed that cholinesterase inhibition could have occurred at higher doses. The dose selected for risk assessment (acute dietary) was the no observable effects level (NOEL) of 0.25 mg/kg/day, based on a lack of cholinesterase inhibition up to day 7 of the study [it was believed that cholinesterase inhibition could have occurred at higher doses].

Although the results of available developmental and reproduction studies showed no increased sensitivity to either developing fetuses or to pups, the FQPA safety factor was retained, but reduced to 3X, because the Committee concluded that the database was inadequate to evaluate acute delayed neurotoxicity following a single exposure, to assess the functional development of young animals, and, in turn, the susceptibility to infants and children, and to determine the need for a developmental neurotoxicity study. For acute dietary risk assessment, a margin of exposure (MOE) of 30 is required, 10X for intra-species variation, and 3X as required under FQPA. The acute dietary reference dose (aRfD), modified in accordance with FQPA, is 0.0083 mg/kg body weight/day.

Chronic Dietary

In 1988, the reference dose (RfD) for chronic dietary risk assessment was selected from a 56-day oral toxicity study in humans; the reference dose was reassessed in the 1/12/98 HIARC meeting, pursuant to FQPA. While the Committee selected the same dose/endpoint for establishing the RfD, the Committee determined that the only dose tested, 0.25 mg/kg/day, should be considered a LOEL (lowest observable effects level), rather than a NOEL, based on statistically significant plasma cholinesterase inhibition in 3 females between days 14 and 35.

The Committee applied an uncertainty factor of 1,000, based on the retention of the 3X safety factor as required under FQPA (see above), a 3X for a lack of a true NOEL, a 10X for intra-species variation, and an additional 10X for data gaps (chronic toxicity in dogs, chronic toxicity/carcinogenicity in rats, and a delayed neurotoxicity study in hens). Therefore, based on the LOEL of 0.25 mg/kg/day and on the uncertainty factor of 1,000X, the reference dose (RfD) for chronic dietary risk assessment, adjusted in accordance with FQPA, is 0.00025 mg/kg/day.

Carcinogenicity

The HIARC concluded that the currently available data did not indicate a significant increase in tumor incidence in the treated animals; however, the data were not adequate to assess the carcinogenic potential of pirimiphos-methyl. Pending receipt of a chronic/carcinogenicity study in rats, a dietary risk assessment for carcinogenicity may be required.

Residue Information

Pirimiphos-methyl is registered for post-harvest use on stored corn and sorghum grain; in addition, products consisting of impregnated materials (ear tags) are registered for application to cattle. For the purpose of this assessment, the only food use for pirimiphos-methyl is the post-harvest use on stored grain. Anticipated residues were generated in conjunction with completion of a residue chemistry chapter in which a tolerance reassessment summary was presented, and the status of the residue chemistry database was summarized.

The following anticipated residues (ARs) were specified [refer to the HED residue chemistry chapter, C. Swartz memo dated 6/1/98] for use in acute and chronic dietary risk assessments (note that % crop treated data provided by BEAD have already been incorporated into the anticipated residues, and therefore should not be applied during the dietary risk analysis):

Table 1. Summary of Anticipated Residues (ARs) for Acute/Chronic Dietary Risk Assessment.

Commodity ¹	Reassessed Tolerance (ppm) ²	Average Residue (ppm) ³	Acute AR (ppm) ⁴	Chronic AR (ppm) ⁵
corn, grain	8	2.51	2.51	0.351
corn, oil	60	30.6	30.6	4.28
sorghum, grain	8	3.90	3.90	0.039
cattle, mbyb	0.02	n/a	0.04	0.000162
cattle, fat	0.02	n/a	0.04	0.000297
poultry, fat	0.02	n/a	0.04	0.000352

¹ Based on available residue chemistry data, HED recommends revocation of tolerances for residues in wheat, rice, kiwi fruit, meat (of cattle, goats, hogs, horses and sheep), milk, poultry meat and eggs, and in milled fractions of grain. Therefore, the commodities shown in the table [and their associated processed commodities] are the only commodities to be incorporated into acute/chronic dietary risk assessments. Since residues do not concentrate in grain milled fractions (with the exception of corn oil), the anticipated residues determined for grains should be used for these commodities in the risk analysis.

² The tolerance reassessment summary was included in the HED residue chemistry chapter dated 6/1/98 (DP Barcode No. D240744).

³ Average residues in corn and sorghum grain were determined from residue trials. The residue in corn oil was based on the average residue in corn grain, and the average concentration factor of 12.2X for corn oil.

⁴ Although HED normally uses tolerance-level residues in the acute dietary risk analysis, average

residues can be used for blended commodities, such as grains and oil. For livestock commodities, the anticipated residue is higher than the tolerance since it must incorporate residues of both parent and the des-ethyl metabolite.

- ⁵ The anticipated residues have been corrected for % crop treated (<1% for sorghum, and 15% for corn). The % crop treated (%CT) data were generated by BEAD in conjunction with completion of the RED; after discussion with BEAD regarding discrepancy between monitoring data and % crop treated, the % CT for corn was revised to include treatment of food corn only.

Results

The DEEM™ Software estimates dietary exposure to pesticides in foods based on the 3-day average of consumption data collected in USDA's Continuing Surveys of Food Intake by Individuals, 1989-1992. Using toxicological parameters specified by HED's HIARC, DEEM™ expresses dietary risk as a function of dose through dietary exposure. The results for pirimiphos-methyl are shown in Tables 2 (chronic dietary risk) and 3 (acute dietary risk).

Table 2. Chronic Dietary Risk Calculated Using DEEM™, Expressed as a Percentage of the Chronic Dietary RfD (adjusted in accordance with FQPA).

Population Subgroup	Exposure (mg/kg body wt/day)	Percent of RfD
U.S. Pop - 48 states - all seasons	0.000564	226
All infants (<1 year)	0.000685	274
Nursing infants (<1 year)	0.000217	87
Non-nursing infants (<1 year)	0.000882	353
Children (1-6 years)	0.001262	505
Children (7-12 years)	0.000975	390
Females (13-19 yrs/not preg. or nursing)	0.000568	227
Males (13-19 years)	0.000714	285

Table 3. Acute Dietary Risk Calculated Using DEEM™, Expressed as a Percentage of the Acute Dietary RfD (adjusted in accordance with FQPA).

Population Subgroup	95th Percentile		99th Percentile		99.9 Percentile	
	Exposure	% aRfD	Exposure	% aRfD	Exposure	% aRfD
U.S. pop - all seasons	0.011888	143	0.020468	247	0.035613	429
Nursing infants (<1yr)	0.007220	87	0.008961	108	0.009260	112
Non-nursing infants (<1 yr)	0.022065	266	0.042357	510	0.144424	1740
Children (1-6 yrs)	0.022578	272	0.033098	399	0.052161	628
Children (7-12 yrs)	0.016447	198	0.024378	294	0.040685	490

The results of the DEEM™ analysis indicate that both acute and chronic dietary risk exceed the Agency's level of concern for all population subgroups. Examination of the commodity contribution analysis reveals that essentially all of the chronic dietary risk is due to residues in corn commodities, the most significant contributor being high fructose corn syrup (HFCS), at an average of 70% of the chronic dietary risk. Note that since there are no processing data to determine a concentration/reduction factor for high fructose corn syrup, the anticipated residue in corn grain was translated to HFCS in the DEEM™ analysis. There are no data indicating whether residues actually occur in HFCS, but HED notes that pirimiphos-methyl residues do not concentrate in corn commodities other than oil.

Although there is no tolerance established for residues in popcorn, this commodity was included in the analysis since the use is post-harvest on the grain, and would not preclude treatment of popcorn. In addition, FDA monitoring data indicated that residues are likely to occur in popcorn.

Refer to the attached DEEM™ analysis for details.

Attachment: Chronic and Acute DEEM™ analyses for pirimiphos-methyl.

Secondary Review: Carol Lang/Brian Steinwand:07/16/98; Brenda Tarplee:07/13/98

cc (with attachment): Reviewer (Cswartz); Brian Steinwand (CEB1/HED, 7509C)

cc (without attachment): List B Rereg. File; SF

7509C:Cswartz:RRB1:CM2:Rm 804F:703 305 5877:07/10/98

U.S. Environmental Protection Agency
 DEEM89N CHRONIC analysis for PIRIMIPHOS-METHYL (1989-92 data)
 Residue file name: CHRONIC Adjustment factor #2 NOT used.
 Analysis Date 07-21-1998 Residue file dated: 07-21-1998/11:38:31/8
 Reference dose (RfD, CHRONIC) = 0.000250 mg/kg body-wt/day
 COMMENT 1: The chronic NOEL is actually a LOEL
 COMMENT 2: RfD incorporates OP Marathon Conclusions

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Residue file listing

Food Code	EPA Code	Crop Group	Food Name	Residue (ppm)	Adj. Fctrs #1	#2
237	15004AA	O	CORN/POP	0.351000	1.00	1.00
266	24002EA	O	CORN GRAIN-ENDOSPERM	0.351000	1.00	1.00
267	24002HA	O	CORN GRAIN-BRAN	0.351000	1.00	1.00
268	24002SA	O	CORN GRAIN/SUGAR/HFCS	0.351000	1.50	1.00
275	24006AA	O	SORGHUM (INCLUDING MILO)	0.039000	1.00	1.00
289	27002OA	O	CORN GRAIN-OIL	4.280000	1.00	1.00
321	53001BA	U	BEEF-MEAT BYPRODUCTS	0.000162	1.00	1.00
322	53001BB	U	BEEF-OTHER ORGAN MEATS	0.000162	1.00	1.00
324	53001FA	U	BEEF-FAT W/O BONES	0.000297	1.00	1.00
325	53001KA	U	BEEF-KIDNEY	0.000162	1.00	1.00
326	53001LA	U	BEEF-LIVER	0.000162	1.00	1.00
368	55015MA	V	CHICKEN-FAT W/O BONES	0.000352	1.00	1.00
388	24002MO	O	CORN GRAIN/SUGAR-MOLASSES	0.351000	1.50	1.00

U.S. Environmental Protection Agency
 DEEM89N CHRONIC analysis for PIRIMIPHOS-METHYL
 Residue file name: CHRONIC
 Analysis Date 07-21-1998
 Reference dose (RfD, CHRONIC) = 0.000250 mg/kg body-wt/day
 COMMENT 1: The chronic NOEL is actually a LOEL
 COMMENT 2: RfD incorporates OP Marathon Conclusions

Ver. 6.12
 (1989-92 data)

Adjustment factor #2 NOT used.

Residue file dated: 07-21-1998/11:38:31/8

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Total exposure by population subgroup

Population Subgroup	Total Exposure	
	mg/kg body wt/day	Percent of Rfd
U.S. Pop - 48 states - all seasons	0.000564	225.5%
U.S. Population - spring season	0.000549	219.7%
U.S. Population - summer season	0.000588	235.4%
U.S. Population - autumn season	0.000575	230.1%
U.S. Population - winter season	0.000539	215.7%
Northeast region	0.000527	210.9%
Midwest region	0.000575	230.0%
Southern region	0.000594	237.6%
Western region	0.000536	214.5%
Pacific Region	0.000505	201.9%
Hispanics	0.000598	239.3%
Non-hispanic whites	0.000550	220.0%
Non-hispanic blacks	0.000632	252.8%
Non-hispanic other than black or white	0.000544	217.7%
All infants (<1 year)	0.000685	273.8%
Nursing infants (<1 year)	0.000217	86.6%
Non-nursing infants (<1 year)	0.000882	352.6%
Children (1-6 years)	0.001262	504.6%
Children (7-12 years)	0.000975	390.0%
Females (13-19 yrs/not preg. or nursing)	0.000568	227.1%
Females (20+ years/not preg. or nursing)	0.000386	154.3%
Females (13-50 years)	0.000441	176.5%
Females (13+/pregnant/not nursing)	0.000425	170.0%
Females (13+/nursing)	0.000465	186.1%
Males (13-19 years)	0.000714	285.4%
Males (20+ years)	0.000423	169.3%
Seniors (55+)	0.000342	136.7%

U.S. Environmental Protection Agency
 DEEM89N CHRONIC analysis for PIRIMIPHOS-METHYL (1989-92 data)
 Residue file name: CHRONIC Adjustment factor #2 NOT used.
 Analysis Date 07-21-1998 Residue file dated: 07-21-1998/11:38:31/8
 Reference dose (RfD, CHRONIC) = 0.000250 mg/kg body-wt/day
 COMMENT 1: The chronic NOEL is actually a LOEL
 COMMENT 2: RfD incorporates OP Marathon Conclusions

Complete commodity contribution analysis for
 U.S. Pop - 48 states - all seasons

Crop Group = (O) CEREAL GRAINS

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of RfD
CORN/POP	0.351000	1.00	1.00	0.0000083	3.3%
CORN GRAIN-ENDOSPERM	0.351000	1.00	1.00	0.0000734	29.4%
CORN GRAIN-BRAN	0.351000	1.00	1.00	0.0000009	0.4%
CORN GRAIN/SUGAR/HFCS	0.351000	1.50	1.00	0.0003496	139.9%
SORGHUM (INCLUDING MILO)	0.039000	1.00	1.00	no exposure	
CORN GRAIN-OIL	4.280000	1.00	1.00	0.0001312	52.5%
CORN GRAIN/SUGAR-MOLASSES	0.351000	1.50	1.00	0.0000003	0.1%
Crop group subtotal				0.0005638	225.5%

Crop Group = (U) RED MEAT

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of RfD
BEEF-MEAT BYPRODUCTS	0.000162	1.00	1.00	0.0000000	0.0%
BEEF-OTHER ORGAN MEATS	0.000162	1.00	1.00	0.0000000	0.0%
BEEF-FAT W/O BONES	0.000297	1.00	1.00	0.0000001	0.0%
BEEF-KIDNEY	0.000162	1.00	1.00	0.0000000	0.0%
BEEF-LIVER	0.000162	1.00	1.00	0.0000000	0.0%
Crop group subtotal				0.0000001	0.0%

Crop Group = (V) POULTRY

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of RfD
CHICKEN-FAT W/O BONES	0.000352	1.00	1.00	0.0000000	0.0%
Crop group subtotal				0.0000000	0.0%
Population subgroup total				0.0005638	225.5%

8815

U.S. Environmental Protection Agency Ver. 6.12
 DEEM89N CHRONIC analysis for PIRIMIPHOS-METHYL (1989-92 data)
 Residue file name: CHRONIC Adjustment factor #2 NOT used.
 Analysis Date 07-21-1998 Residue file dated: 07-21-1998/11:38:31/8
 Reference dose (Rfd, CHRONIC) = 0.000250 mg/kg body-wt/day
 COMMENT 1: The chronic NOEL is actually a LOEL
 COMMENT 2: Rfd incorporates OP Marathon Conclusions

Complete commodity contribution analysis for
 All infants (<1 year)

Crop Group = (O) CEREAL GRAINS

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of Rfd
CORN/POP	0.351000	1.00	1.00	no exposure	
CORN GRAIN-ENDOSPERM	0.351000	1.00	1.00	0.0000441	17.6%
CORN GRAIN-BRAN	0.351000	1.00	1.00	0.0000000	0.0%
CORN GRAIN/SUGAR/HFCS	0.351000	1.50	1.00	0.0005530	221.2%
SORGHUM (INCLUDING MILO)	0.039000	1.00	1.00	no exposure	
CORN GRAIN-OIL	4.280000	1.00	1.00	0.0000875	35.0%
CORN GRAIN/SUGAR-MOLASSES	0.351000	1.50	1.00	0.0000000	0.0%
Crop group subtotal				0.0006846	273.8%

Crop Group = (U) RED MEAT

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of Rfd
BEEF-MEAT BYPRODUCTS	0.000162	1.00	1.00	0.0000000	0.0%
BEEF-OTHER ORGAN MEATS	0.000162	1.00	1.00	0.0000000	0.0%
BEEF-FAT W/O BONES	0.000297	1.00	1.00	0.0000000	0.0%
BEEF-KIDNEY	0.000162	1.00	1.00	no exposure	
BEEF-LIVER	0.000162	1.00	1.00	no exposure	
Crop group subtotal				0.0000000	0.0%

Crop Group = (V) POULTRY

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of Rfd
CHICKEN-FAT W/O BONES	0.000352	1.00	1.00	0.0000000	0.0%
Crop group subtotal				0.0000000	0.0%
Population subgroup total				0.0006846	273.8%

U.S. Environmental Protection Agency Ver. 6.12
 DEEM89N CHRONIC analysis for PIRIMIPHOS-METHYL (1989-92 data)
 Residue file name: CHRONIC Adjustment factor #2 NOT used.
 Analysis Date 07-21-1998 Residue file dated: 07-21-1998/11:38:31/8
 Reference dose (RfD, CHRONIC) = 0.000250 mg/kg body-wt/day
 COMMENT 1: The chronic NOEL is actually a LOEL
 COMMENT 2: RfD incorporates OP Marathon Conclusions

Complete commodity contribution analysis for
 Nursing infants (<1 year)

Crop Group = (O) CEREAL GRAINS

Food Name	Residue (ppm)	Adjustment Factors	Exposure Analysis	
			mg/kg body wt/day	Percent of RfD
CORN/POP	0.351000	1.00	1.00 no exposure	
CORN GRAIN-ENDOSPERM	0.351000	1.00	1.00 0.0000090	3.6%
CORN GRAIN-BRAN	0.351000	1.00	1.00 0.0000000	0.0%
CORN GRAIN/SUGAR/HFCS	0.351000	1.50	1.00 0.0001910	76.4%
SORGHUM (INCLUDING MILO)	0.039000	1.00	1.00 no exposure	
CORN GRAIN-OIL	4.280000	1.00	1.00 0.0000166	6.6%
CORN GRAIN/SUGAR-MOLASSES	0.351000	1.50	1.00 no exposure	
Crop group subtotal			0.0002166	86.6%

Crop Group = (U) RED MEAT

Food Name	Residue (ppm)	Adjustment Factors	Exposure Analysis	
			mg/kg body wt/day	Percent of RfD
BEEF-MEAT BYPRODUCTS	0.000162	1.00	1.00 no exposure	
BEEF-OTHER ORGAN MEATS	0.000162	1.00	1.00 no exposure	
BEEF-FAT W/O BONES	0.000297	1.00	1.00 0.0000000	0.0%
BEEF-KIDNEY	0.000162	1.00	1.00 no exposure	
BEEF-LIVER	0.000162	1.00	1.00 no exposure	
Crop group subtotal			0.0000000	0.0%

Crop Group = (V) POULTRY

Food Name	Residue (ppm)	Adjustment Factors	Exposure Analysis	
			mg/kg body wt/day	Percent of RfD
CHICKEN-FAT W/O BONES	0.000352	1.00	1.00 0.0000000	0.0%
Crop group subtotal			0.0000000	0.0%
Population subgroup total			0.0002166	86.6%

U.S. Environmental Protection Agency Ver. 6.12
 DEEM89N CHRONIC analysis for PIRIMIPHOS-METHYL (1989-92 data)
 Residue file name: CHRONIC Adjustment factor #2 NOT used.
 Analysis Date 07-21-1998 Residue file dated: 07-21-1998/11:38:31/8
 Reference dose (RfD, CHRONIC) = 0.000250 mg/kg body-wt/day
 COMMENT 1: The chronic NOEL is actually a LOEL
 COMMENT 2: RfD incorporates OP Marathon Conclusions

Complete commodity contribution analysis for
 Non-nursing infants (<1 year)

Crop Group = (O) CEREAL GRAINS

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of RfD
CORN/POP	0.351000	1.00	1.00	no exposure	
CORN GRAIN-ENDOSPERM	0.351000	1.00	1.00	0.0000588	23.5%
CORN GRAIN-BRAN	0.351000	1.00	1.00	0.0000000	0.0%
CORN GRAIN/SUGAR/HFCS	0.351000	1.50	1.00	0.0007053	282.1%
SORGHUM (INCLUDING MILO)	0.039000	1.00	1.00	no exposure	
CORN GRAIN-OIL	4.280000	1.00	1.00	0.0001174	46.9%
CORN GRAIN/SUGAR-MOLASSES	0.351000	1.50	1.00	0.0000000	0.0%
Crop group subtotal				0.0008816	352.6%

Crop Group = (U) RED MEAT

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of RfD
BEEF-MEAT BYPRODUCTS	0.000162	1.00	1.00	0.0000000	0.0%
BEEF-OTHER ORGAN MEATS	0.000162	1.00	1.00	0.0000000	0.0%
BEEF-FAT W/O BONES	0.000297	1.00	1.00	0.0000000	0.0%
BEEF-KIDNEY	0.000162	1.00	1.00	no exposure	
BEEF-LIVER	0.000162	1.00	1.00	no exposure	
Crop group subtotal				0.0000000	0.0%

Crop Group = (V) POULTRY

Food Name	Residue (ppm)	Adjustment Factors		Exposure Analysis	
				mg/kg body wt/day	Percent of RfD
CHICKEN-FAT W/O BONES	0.000352	1.00	1.00	0.0000000	0.0%
Crop group subtotal				0.0000000	0.0%
Population subgroup total				0.0008816	352.6%

11/2/15

Acute

"pirimiphos-methyl"

0.00025

NEW91, 0.0083

NOEL, 0.25

0.25

0

07-10-1998/10:29:17

-1 "The chronic NOEL is actually a LOEL"

999

237	15004AA,O,	2.51	1	1	0	"CORN/POP", ""
266	24002EA,O,	2.51	1	1	0	"CORN GRAIN-ENDOSPERM", ""
267	24002HA,O,	2.51	1	1	0	"CORN GRAIN-BRAN", ""
268	24002SA,O,	2.51	1.5	1	0	"CORN GRAIN/SUGAR/HFCS", ""
275	24006AA,O,	3.9	1	1	0	"SORGHUM (INCLUDING MILO)", ""
289	27002OA,O,	30.6	1	1	0	"CORN GRAIN-OIL", ""
321	53001BA,U,	0.04	1	1	0	"BEEF-MEAT BYPRODUCTS", ""
322	53001BB,U,	0.04	1	1	0	"BEEF-OTHER ORGAN MEATS", ""
324	53001FA,U,	0.04	1	1	0	"BEEF-FAT W/O BONES", ""
325	53001KA,U,	0.04	1	1	0	"BEEF-KIDNEY", ""
326	53001LA,U,	0.04	1	1	0	"BEEF-LIVER", ""
368	55015MA,V,	0.04	1	1	0	"CHICKEN-FAT W/O BONES", ""
388	24002MO,O,	2.51	1.5	1	0	"CORN GRAIN/SUGAR-MOLASSES", ""

129.15

U.S. Environmental Protection Agency
 DEEM ACUTE analysis for PIRIMIPHOS-METHYL
 Residue file name: acute.R91
 Analysis Date: 07-10-1998/11:11:19
 Acute Reference Dose (aRfD) = 0.008300 mg/kg body-wt/day
 Run Comment: The chronic NOEL is actually a LOEL

Ver. 6.27
 (1989-92 data)
 Adjustment factor #2 NOT used.

Residue file dated: 07-10-1998/10:29:17/8

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U.S. pop - all seasons	Daily Exposure Analysis 1/ (mg/kg body-weight/day)	
	per Capita	per User
Mean	0.004035	0.004069
Standard Deviation	0.004300	0.004302
Standard Error	0.000023	0.000023
Percent of aRfD	48.61	49.02

Percent of Person-Days that are User-Days = 99.16%

Estimated percentile of user-days exceeding calculated exposure
 in mg/kg body-wt/day and corresponding percent of aRfD

Percentile	Exposure	% aRfD	Percentile	Exposure	% aRfD
90.00	0.000662	7.98	10.00	0.008772	105.68
80.00	0.001185	14.28	5.00	0.011915	143.55
70.00	0.001702	20.50	2.50	0.015577	187.68
60.00	0.002243	27.02	1.00	0.020496	246.94
50.00	0.002861	34.47	0.50	0.025268	304.44
40.00	0.003602	43.40	0.25	0.029391	354.11
30.00	0.004549	54.81	0.10	0.035649	429.50
20.00	0.006054	72.94			

Estimated percentile of per-capita days exceeding calculated exposure
 in mg/kg body-wt/day and corresponding percent of aRfD

Percentile	Exposure	% aRfD	Percentile	Exposure	% aRfD
90.00	0.000612	7.37	10.00	0.008749	105.41
80.00	0.001150	13.86	5.00	0.011888	143.23
70.00	0.001671	20.13	2.50	0.015546	187.30
60.00	0.002215	26.69	1.00	0.020468	246.60
50.00	0.002834	34.15	0.50	0.025228	303.95
40.00	0.003577	43.09	0.25	0.029356	353.69
30.00	0.004525	54.52	0.10	0.035613	429.08
20.00	0.006028	72.63			

1/ Analysis based on all three-day participant records in CSFII 1989-92 survey.

1

U.S. Environmental Protection Agency
 DEEM ACUTE analysis for PIRIMIPHOS-METHYL
 Residue file name: acute.R91
 Analysis Date: 07-10-1998/11:11:19
 Acute Reference Dose (aRfD) = 0.008300 mg/kg body-wt/day

Ver. 6.27
 (1989-92 data)
 Adjustment factor #2 NOT used.

Residue file dated: 07-10-1998/10:29:17/8

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Nursing infants (<1 year)	Daily Exposure Analysis (mg/kg body-weight/day)	
	per Capita	per User
Mean	0.001554	0.004144
Standard Deviation	0.002415	0.002195
Standard Error	0.000195	0.000339
Percent of aRfD	18.72	49.93

13815

Estimated percentile of per-capita days exceeding calculated exposure
in mg/kg body-wt/day and corresponding percent of aRfD

Percentile	Exposure	% aRfD	Percentile	Exposure	% aRfD
90.00	0.000000	0.00	10.00	0.018716	225.49
80.00	0.000000	0.00	5.00	0.022065	265.84
70.00	0.000000	0.00	2.50	0.027199	327.70
60.00	0.000543	6.54	1.00	0.042357	510.33
50.00	0.001211	14.59	0.50	0.070688	851.66
40.00	0.003845	46.32	0.25	0.110919	1336.37
30.00	0.007086	85.37	0.10	0.144424	1740.05
20.00	0.011619	139.99			

3

U.S. Environmental Protection Agency Ver. 6.27
DEEM ACUTE analysis for PIRIMIPHOS-METHYL (1989-92 data)
Residue file name: acute.R91 Adjustment factor #2 NOT used.
Analysis Date: 07-10-1998/11:11:19 Residue file dated: 07-10-1998/10:29:17/8
Acute Reference Dose (aRfD) = 0.008300 mg/kg body-wt/day

Children (1-6 years)

	Daily Exposure Analysis (mg/kg body-weight/day)	
	per Capita	per User
Mean	0.009026	0.009034
Standard Deviation	0.006879	0.006876
Standard Error	0.000111	0.000111
Percent of aRfD	108.74	108.85

Percent of Person-Days that are User-Days = 99.90%

Estimated percentile of user-days exceeding calculated exposure
in mg/kg body-wt/day and corresponding percent of aRfD

Percentile	Exposure	% aRfD	Percentile	Exposure	% aRfD
90.00	0.002191	26.40	10.00	0.017583	211.84
80.00	0.003669	44.21	5.00	0.022583	272.08
70.00	0.004833	58.23	2.50	0.026822	323.16
60.00	0.006238	75.16	1.00	0.033102	398.82
50.00	0.007451	89.77	0.50	0.037035	446.21
40.00	0.008863	106.78	0.25	0.040480	487.72
30.00	0.010901	131.33	0.10	0.052169	628.54
20.00	0.013407	161.53			

Estimated percentile of per-capita days exceeding calculated exposure
in mg/kg body-wt/day and corresponding percent of aRfD

Percentile	Exposure	% aRfD	Percentile	Exposure	% aRfD
90.00	0.002172	26.17	10.00	0.017579	211.79
80.00	0.003658	44.07	5.00	0.022578	272.03
70.00	0.004825	58.13	2.50	0.026818	323.11
60.00	0.006230	75.06	1.00	0.033098	398.77
50.00	0.007445	89.70	0.50	0.037031	446.16
40.00	0.008857	106.71	0.25	0.040477	487.68
30.00	0.010895	131.26	0.10	0.052161	628.45
20.00	0.013403	161.48			

10/15

Summary calculations:

	95th Percentile		99th Percentile		99.9 Percentile	
	Exposure	% aRfD	Exposure	% aRfD	Exposure	% aRfD
U.S. pop - all seasons:	0.011888	143.23	0.020468	246.60	0.035613	429.08
Nursing infants (<1 year):	0.007220	86.99	0.008961	107.97	0.009260	111.57
Non-nursing infants (<1 yr):	0.022065	265.84	0.042357	510.33	0.144424	1740.05
Children (1-6 years):	0.022578	272.03	0.033098	398.77	0.052161	628.45
Children (7-12 years):	0.016447	198.16	0.024378	293.71	0.040685	490.18